

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

U.S. DISTRICT COURT
DISTRICT OF MAINE
PORTLAND
RECEIVED & FILED

2023 AUG -9 P 1:25

UNITED STATES OF AMERICA

v.

NICHOLE BACHELDER

No. 2:23-cr-77-JAW DEPUTY CLERK

INDICTMENT

The Grand Jury charges:

COUNT ONE
(False Statements During the Purchase of Firearms)

On about October 19, 2022, in the District of Maine, the defendant

NICHOLE BACHELDER

knowingly made false statements and representations to G3 Firearms, a Federal Firearms Licensee ("FFL") licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the FFL's records. Specifically, the defendant executed Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, in connection with her attempted purchase of a Glock, model 26, 9mm pistol, serial number ADGU067.

On the Form 4473, the defendant misrepresented as true, correct, and complete in Section B, Box 10, that her current residence was one address in Livermore Falls, Maine, when in fact, the defendant did not reside there. The defendant also misrepresented as true, correct, and complete in Section B, Box 21.a, that she was the actual transferee/buyer of the firearm, and was not buying it on behalf of another

person, when in fact, the defendant attempted to purchase the firearm at the direction of, and with funds provided by, a coconspirator. Also in the Form 4473, the defendant misrepresented as true, correct, and complete in Section B, Box 21.e, that she was not an unlawful user of, or addicted to, any controlled substance, when in fact, the defendant was then an unlawful user of cocaine base, a Schedule II controlled substance.

In this way, the defendant violated Title 18, United States Code, Section 924(a)(1)(A).

**Signature Redacted – Original on file
with the Clerk's Office**


Assistant United States Attorney

Date: AUGUST 9, 2023